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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S MOTION TO COMPEL
DISCOVERY, LIFT DISCOVERY STAY,
AND FOR SANCTIONS

Date: May 8, 2025
Time: 10:00 am
Crtrm: 6D

Dated this: April 26, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

Certification of Meet and Confer Efforts

Pursuant to Local Rule 37-1, Plaintiff hereby certifies that he made a good faith attempt to resolve the discovery disputes without Court intervention.

On April 17, 2025, Plaintiff sent a Local Rule 37-1 discovery dispute letter to Defendant's counsel identifying deficiencies in Riot Games, Inc.'s responses to Plaintiff's Requests for Production, Interrogatories, and Requests for Admission.

Plaintiff offered to meet and confer telephonically or in writing.

Defendant and the Conference Judge pressed to table discussions until after the April 24, 2025 settlement conference.

Following the failed settlement conference, Defendant has continued to refuse to engage in meaningful discovery discussions or produce responsive materials.

Accordingly, Plaintiff brings this Motion in good faith after exhausting efforts to resolve the matter informally.

Additionally, every direct communication the Plaintiff has ever had with Riot's legal team is manipulated, he is lied to, his position is misappropriated, then he is told he can't do that, and told that the case is going to be dismissed, then ended with "*We are going to do this anyway.*" And then is met with many diversion tactics. The Plaintiff asked that all Meet and Confers be written or documented for this reason but again was hit with diversions.

The Plaintiff believes that it would be inappropriate to keep exposing him to the same abuse of procedure and same harassing tactics over and over. Riot, the settlement Judge and even its cult community have commented on them doing this and stated that they will eventually abuse and bully until they win.

TO THE HONORABLE COURT:

Plaintiff Marc Wolstenholme respectfully moves this Court for an order compelling Defendant Riot Games, Inc. ("Riot") to produce complete discovery responses, lifting any stay or delay on discovery, and for sanctions under Rule 37 of the Federal Rules of Civil Procedure. In support of this Motion, Plaintiff states as follows:

I. INTRODUCTION

Since March 14, 2025, Plaintiff has served properly tailored Requests for Production (RFPs), Interrogatories, and Requests for Admission (RFAs) seeking basic and essential information regarding access, development timelines, and internal communications about Plaintiff's copyrighted work "Bloodborg: The Harvest." Riot has responded with blanket objections, categorical denials, and refused to produce any substantive information.

Despite Plaintiff's attempts to resolve these issues through the Local Rule 37-1 meet and confer process, Riot delayed and leveraged the settlement conference to avoid its discovery obligations. The settlement conference itself was procedurally tainted and utterly shameful, as detailed below and.

The Plaintiff now seeks an order compelling immediate compliance and the imposition of sanctions to deter further misconduct.

1 **II. FACTUAL BACKGROUND**

2 On April 24, 2025, during the confidential settlement conference, Magistrate
3 Judge Brianna Fuller Mircheff introduced so-called "evidence" from the Wayback Machine
4 depicting Riot Games' submission portal. The Judge pressed Plaintiff as to whether he submitted
5 his work "as an attachment" or typed it directly into a portal field, and asserted, without any
6 admissible foundation, that the portal had a "150-word limit."
7

8
9 **Plaintiff respectfully submits that:**

10 At no time in the filings did Plaintiff claim he "attached" a file or mention a 150-
11 word limit;
12

13 Plaintiff consistently alleged submission of full manuscripts and provided
14 metadata chronologies;

15 Investigation confirms that Riot Forge portals had no visible word or character
16 limit and used expandable fields;
17

18 Industry practices support acceptance of full-length creative submissions;

19 The only "evidence" Riot has produced after 3.5 years is a manipulated screenshot
20 from the Wayback Machine when they own and control the actual portal.
21

22 Following the conference, Plaintiff received harassment on his personal website
23 echoing the exact falsehoods promoted at the conference, suggesting an improper leak and
24 coordinated attack with the same hate mail chain well documented to be from Riot and its cult.
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1 **III. ARGUMENT**

2 A. Riot Has Refused to Engage in Good Faith Discovery

3 Under Rule 26(b)(1), parties are entitled to discovery of non-privileged
4 information relevant to any party's claims or defenses. Riot's blanket objections, refusal to
5 answer basic Interrogatories, and categorical denials of RFAs constitute clear violations of these
6 obligations.
7

8
9 B. Plaintiff's Requests Are Directly Relevant and Proportional

10 Plaintiff's requests target:

11 Evidence of access to Bloodborg submissions;

12 Development timelines and concept drafts;

13 Communications between Riot and literary agencies (CBG, UTA, CAA);

14 Internal metadata regarding submission receipt and review.
15
16

17 These requests go to the heart of Plaintiff's copyright infringement claims.
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20 C. Court Supervision or Special Master Appointment is Warranted

21 Given Riot's repeated procedural abuse and bad faith, future discovery should be
22 supervised directly by the District Judge or a Special Master to ensure compliance and
23 transparency.
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1 D. Sanctions Are Appropriate

2 Under Rule 37(a)(5), the Court must impose sanctions, including costs and fees,
3 where a motion to compel is granted unless the non-disclosure was substantially justified. Riot's
4 conduct is not justified and warrants sanctions.
5

6
7 **IV. REQUESTED RELIEF**

8 Plaintiff respectfully requests that the Court:

9 Lift any discovery stay associated with the settlement conference;

10 Order Riot to produce complete responses to Plaintiff's March 14, 2025 RFPs,
11 Interrogatories, and RFAs within 10 days;

12 Compel Riot to produce full unaltered metadata and access logs from Riot Forge
13 and agency submissions;

14 Compel Riot to respond to Plaintiff's newly served Requests for Admission and
15 Interrogatories regarding portal functionality;

16 Appoint a Special Master or require judicial supervision of future discovery;

17 Award Plaintiff costs and sanctions under Rule 37(a)(5).

18 Assess whether criminal investigations need to be triggered to protect the Plaintiff
19 and public.
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V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this Court grant this Motion to Compel Discovery, Lift Discovery Stay, and impose appropriate sanctions against Riot Games, Inc.

The Plaintiff will add, that Riot may think it's all fun and games to rape a vulnerable disabled veteran's trauma writing then have their cult, expensive legal team and others they influence or pay, harass, intimidate and threaten the Plaintiff and their endless other vulnerable victims, yet they will not be laughing or acting all predatorial if and when their crimes and abuses catch up with them and their over watchers, or when one of their mentally ill cult members, influence by Riot's predatorial business practices and toxic radicalized community, shoots up a school or kills his mother because she didn't buy enough energy drinks to last the weekend isolated in the basement whilst Riot harvest the data and pretend to have learnt from the class action lawsuit and subjugation of women.

Riot's actions in this case are utterly deplorable and directly align with the many past concerns about their core business deviance and abuses against vulnerable people.

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 26, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

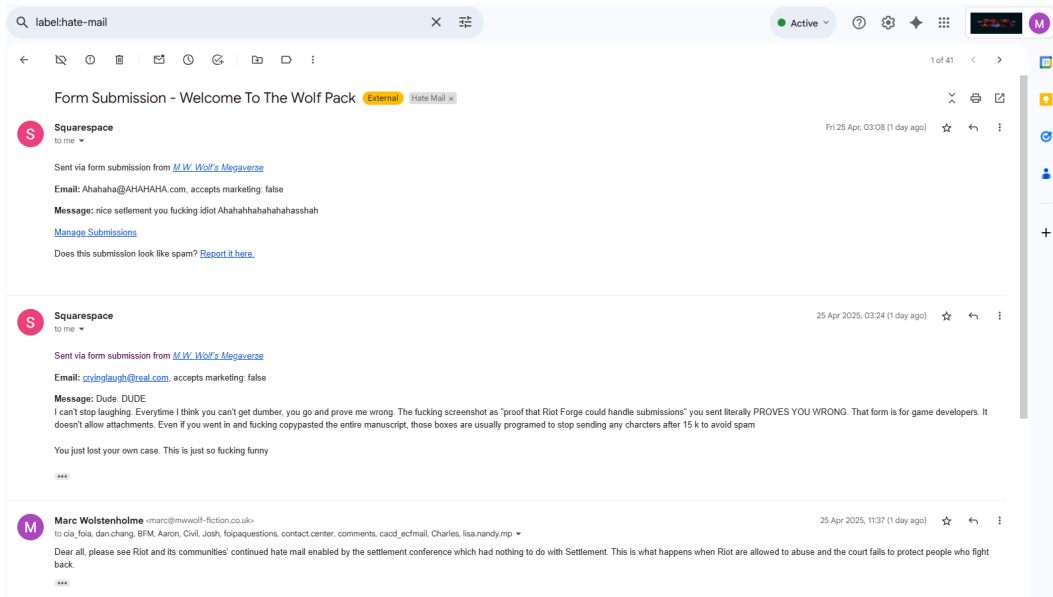
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Exhibit A- hate mail evidence of the same wording used by the judge as directed by Riot Games and accepted on face value.



"Fri 25 Apr, 03:08

Message: nice settlement you fucking idiot Ahahahhahahahahassshah

Fri 25 Apr, 03:24

Message: Dude. DUDE

"I can't stop laughing. Everytime I think you can't get dumber, you go and prove me wrong. The fucking screenshot as "proof that Riot Forge could handle submissions" you sent literally PROVES YOU WRONG. That form is for game developers. It doesn't allow attachments. Even if you went in and fucking cypasted the entire manuscript, those boxes are usually programed to stop sending any charcters after 15 k to avoid spam

You just lost your own case. This is just so fucking funny"